IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA No. 15-cv-00742

CARRIE HUTSON, JEANNA SIMMONS,)
JENIFER SWANNER, INDIVIDUALLY)
AND AS CLASS REPRESENTATIVES,)
)
Plaintiffs,)
v.) CONSENT MOTION FOR) PROTECTIVE ORDER
CAH ACQUISITION COMPANY 10, LLC)
d/b/a YADKIN VALLEY COMMUNITY)
HOSPITAL; HMC/CAH CONSOLIDATED,)
INC.; and RURAL COMMUNITY	,)
HOSPITALS OF AMERICA, LLC,)
)
Defendants.)

NOW COME Plaintiffs Carrie Hutson, Jeanna Simmons, and Jenifer Swanner ("Named Plaintiffs"), with consent of Defendants, and for good cause, move this Court for a Protective Order pursuant to Rule 26(c) of the Federal Rules of Civil Procedure to maintain the confidentiality of proprietary business or financial information regarding Defendants, employment-related personnel information on individual parties or nonparties, and private financial and personal information on individual parties and nonparties. The parties seek to limit the use of the information and documents to protect themselves from annoyance and potential embarrassment as well as to maintain the confidentiality of such information, as stated in the proposed Protective Order submitted with this motion.

WHEREFORE, the Named Plaintiffs, with consent of Defendants, move for the court to enter the proposed Protective Order submitted for consideration.

This the 17th day of March, 2016.

Taibi Kornbluth Law Group, P.A.

/s/ Michael A. Kornbluth

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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date filed the foregoing *Consent*Motion for Protective Order with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

John J. Doyle, Jr. Constangy, Brooks, Smith, Prophete, LLP 100 North Cherry Street, Ste. 300 Winston-Salem, NC 27101

This the 17th day of March, 2016.

Taibi Kornbluth Law Group, P.A.

/s/ Michael A. Kornbluth Michael A. Kornbluth Attorney for Plaintiff N.C. State Bar No. 27928 3100 Tower Blvd., Suite 800 Durham, NC 27707 Telephone: (919) 401-4100

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